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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

YASMIN PAZANDEH and MAJID
PAZANDEH,

Plaintiff,

vs.

NAVIENT SOLUTIONS, INC.,
formerly SALLIE MAE, INC., and
DOES 1 through 20, inclusive,

Defendants.

Case No.:

NOTICE OF REMOVAL OF ACTION
UNDER 28 U.S.C. § 1441(a) –
FEDERAL QUESTION

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE THAT defendant Navient Solutions, Inc.,
formerly known as Sallie Mae, Inc. ("NAVIENT") hereby removes to this Court
the state court action described below.

1 1. This action is a civil action of which this Court has original
2 jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this
3 Court by defendant pursuant to the provisions of 28 U.S.C. § 1441(a) in that it
4 arises under the Telephone Consumer Protection Act, 47 U.S.C. § 227. *See Mims*
5 *v. Arrow Fin. Services, LLC*, 132 S. Ct. 740, 743 (2012). This Court also has
6 supplemental jurisdiction over Plaintiff's claims arising under state law. *See* 28
7 U.S.C. § 1367(a).

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11 2. On or about May 7, 2015 the action was commenced in the Superior
12 Court of the State of California, County of Orange, entitled *Yasmin Pazandeh and*
13 *Majid Pazandeh v. Navient Solutions, Inc., formerly Sallie Mae, Inc. and Does 1*
14 *through 20*, Case No. 30-2015-00786480-CU-NP-CJC. A copy of the Plaintiff's
15 Summons and Complaint ("Complaint") are attached hereto as Exhibit A.

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18 3. The date upon which NAVIENT first received a copy of the
19 Complaint was May 12, 2015, when NAVIENT's agent for service of process was
20 served with a copy of the Complaint. Removal is therefore timely pursuant to 28
21 U.S.C. § 1446(b)(1).

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24 4. A copy of this Notice of Removal is being served upon Plaintiff and
25 concurrently filed in the State Court Action.

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27 5. The State Court Action is located within the Central District of
28 California. Therefore, venue for purposes of removal is proper because the United

1 States District Court for the Central District of California embraces the place in
2 which the removed action was pending. 28 U.S.C. § 1441(a).
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4 6. Removal of the State Court Action is therefore proper under 28 U.S.C.
5 §§ 1441 and 1446.
6

7 Dated: 6/11/15

SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.P.

8 /s/Debbie P. Kirkpatrick

9 Debbie P. Kirkpatrick

10 Attorney for Defendant

11 Navient Solutions, Inc., formerly Sallie Mae, Inc.
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